

February 8, 1972

Mr. D. J. Hendrickson
Director, Pipeline Safety Division
Indiana Public Service Commission
901 State Office Building
Indianapolis, Indiana 46204

Dear Mr. Hendrickson:

This is in reply to your letter of December 17, 1971, relative to monitoring cathodic protection on short sections of cathodically protected mains not in excess of 100 feet or separately protected service lines as covered in Section 192.465. The situation you presented and questions relative to it as related to the sampling procedures covered in Section 192.465 are as follows:

The procedure seems clear until you apply it to an operator who regularly adds short, independently protected services or mains. When this happens, it appears that this 10% sampling basis will not cover the entire system in each 10-year period.

Is a sliding 10-year period satisfactory or is there another technique implied whereby the entire system can be covered in each 10-year period when 100% testing is impractical on a yearly basis?

The purpose of making tests on service lines on a 10% sampling basis is to be sure that all services receiving protection at relatively the same time are still protected. In an expanding area, where services are added each year, there will be a larger number of services checked each subsequent year and the operator should be able to evaluate the level of protection as related to time of installation even if the testing of 100% of the services are not attained for the particular expanding area. The objective in making the 10% sampling check each year will, however, be accomplished. When no more services are being added in any given area, then the 10-year coverage cycle will be accomplished.

If the pipelines owned by operator "A" and operator "B" were gas and liquid, respectively, subject to Parts 192 and 195, it would not be necessary for each operator to separately check the effectiveness of the bond. Instead, operator "A" or "B" could make the physical check and transmit the information to the other, just so both operators would have the necessary knowledge and record of the effectiveness of the compensating bond. Corrective measures must be taken, if found necessary.

"Case 2. The pipeline owned by operator "A" is not a gas pipeline; the line owned by operator "B" is a gas pipeline."

The gas operator is responsible for assuring that each interference bond whose failure would jeopardize structure protection is checked at intervals not to exceed two months, per Section

192.465(c) of the gas pipeline safety regulations. In this case, the failure of the compensating bond could seriously jeopardize the integrity of the gas pipeline owned by operator "B."

If the pipelines owned by operator "A" and operator "B" were liquid and gas, respectively, subject to Parts 195 and 192, it would not be necessary for each operator to separately check the effectiveness of the bond. One operator could make the check and pass on his findings to the other operator for his information and record. Corrective measures must be taken, if found necessary.

"Case 3. Both pipelines are gas pipelines."

The gas operators are responsible for assuring that each interference bond whose failure would jeopardize structure protection is checked at intervals not to exceed two months, per Section 192.465(c) of the gas pipeline safety regulations. Because both pipelines are gas and must meet the same requirements, the operators could more readily make mutual arrangements for checking, just so long as the interval does not exceed two months, and so long as each operator knows that the bond is effective and this information is reflected in each operator's record. Corrective measures must be taken, if found necessary.

"Case 4. Neither pipeline is a gas pipeline."

If a compensating bond is used between pipelines that are not gas pipelines, there is no requirement for monitoring by gas pipeline operators.

However, if one or both pipelines carry liquids that are subject to Part 195 of the liquid pipeline safety regulations, present requirements would necessitate a check of the compensating bond at least annually.

In covering each case, we have used repetitive phrasing. This was done so that each case would be covered independently and without reference to a previous case. We trust this explanation clarifies the responsibility for checking interference bonds. We concur that this information should be included in our monthly Advisory Bulletin, and plan to do so.

Sincerely,

Joseph C. Caldwell
Acting Director
Office of Pipeline Safety